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Attorneys for Defendants

**UNITED STATES DISTRICT COURT  
 DISTRICT OF ARIZONA**

Cleopatria Martinez,

Plaintiff,

v.

Maricopa County Community College  
 District; et al.,

Defendants.

No. CV 15-01759-PHX-NVW

**DEFENDANTS' STATEMENT OF  
 CONSULTATION IN SUPPORT OF  
 MOTION FOR ATTORNEYS' FEES**

I, Shayna H. Balch, counsel for Defendants Maricopa County Community College District ("MCCCD") and Rufus Glasper and Debra Glasper (collectively "Defendants"), hereby certify that I engaged in personal consultation with Plaintiffs' counsel, Edmundo Robaina, regarding the disputed issues between the parties pertaining to attorneys' fees, pursuant to Local Rule 54.2(d). On November 15, 2017, I discussed informal options for resolving MCCCD's Motion for Attorneys' Fees with Attorney Robaina. Undersigned defense counsel discussed with Attorney Robaina the approximate amount of attorneys' fees and non-taxable costs which Defendants are seeking and their grounds for doing so. Counsel for the parties had a cordial discussion and Attorney Robaina indicated that he was open to having an additional discussion with defense counsel next week after he had an opportunity to confer with his client.

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1 In sum, the parties' efforts to resolve the issues pertaining to MCCCCD's request  
2 for attorneys' fees are ongoing but to date have been unsuccessful. Accordingly,  
3 Defendants' Motion for Attorneys' Fees is necessary. In the event the parties are able to  
4 resolve the issue of attorneys' fees and non-taxable costs, the parties will promptly  
5 inform the Court.

6  
7 RESPECTFULLY SUBMITTED this 15th day of November 2017.

8 FISHER & PHILLIPS LLP

9 By s/ Shayna H. Balch

10 Pavneet Singh Uppal

11 Shayna H. Balch

12 Alanna R. Brook

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15 Attorneys for Defendants  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 15, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrant(s):

Edmundo P. Robaina  
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s/ Michelle C. Colwell

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